

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER NO. 13
	:	
KAREN PAULK,	:	CASE NO. 20-10891 MDC
	:	
<u>DEBTOR,</u>	:	
	:	
PENNSYLVANIA DEPARTMENT	:	HEARING DATE AND TIME
OF REVENUE,	:	May 28, 2020 @ 9:30 a.m.
	:	
MOVANT,	:	
	:	
V.	:	
	:	
KAREN PAULK,	:	
	:	
RESPONDENT,	:	RELATED TO DOCKET NO. 10

PENNSYLVANIA DEPARTMENT OF REVENUE'S
OBJECTION TO DEBTOR'S PROPOSED CHAPTER 13 PLAN

NOW COMES the Commonwealth of Pennsylvania, Department of Revenue (hereinafter "Department"), by and through its Office of Chief Counsel and Deputy Chief Counsel Jonathan W. Chatham, and files this plan objection as authorized by 11 U.S.C. § 1324 for the following reasons to wit:

1. This objection is made on the grounds that the Plan does not comply with the provisions of Chapter 13, nor has the Plan been proposed in good faith as required by 11 U.S.C. § 1325(a)(1), and (3). The Debtor's obligation pursuant to 11 U.S.C. § 1322(a)(2), to provide for full payment of all claims entitled to priority under 11 U.S.C. § 507 has not been met.
2. The Department's Proof of Claim, containing a priority claim in the amount of \$4,916.36 is not specifically treated within the Debtor's proposed Chapter 13 Plan in the proper

classification or amounts. The Department's claim is docketed on the claims register, and is identified as Docket 1.

3. Providing for the full payment of the Department's claim would assist the Court, the Trustee, the Debtor, and the other creditors in determining the viability of the Plan.
4. The Department also objects to the confirmation of Debtor's Plan on the grounds that the Plan is underfunded.
5. Ultimately, the Department must object to the Debtors' instant Plan because it is not proposed in good faith and in compliance with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Department respectfully requests this Honorable Court deny confirmation of the Debtors' Proposed Chapter 13 Plan unless and until the Department's Objections have been cured and an amended plan is filed that accounts for the Department's claim(s) in the proper classification and amount.

Respectfully submitted by:

/s/ Jonathan W. Chatham
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